

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CONVERGEN ENERGY LLC, L'ANSE WARDEN  
ELECTRIC COMPANY, LLC, EUROENERGY  
BIOGAS LATVIA LIMITED, and LIBRA CAPITAL  
US, INC.

Plaintiffs,

-against-

STEVEN J. BROOKS, NIAN TICVISTA ENERGY  
LLC, GREGORY MERLE, RIVERVIEW ENERGY  
CORPORATION, DANIEL ESCANDON GARCIA,  
RAMON URIARTE INCHAUSTI, CHIPPER  
INVESTMENT SCR, SA, URINCHA SL, THEODORE  
JOHN HANSEN, BRIAN R. MIKKELSON, and  
CONVERGEN ENERGY WI, LLC,

Defendants.

Index No. **1:20-cv-03746** (LJL)

**NOTICE OF MOTION TO STAY ARBITRATION**

**PLEASE TAKE NOTICE**, that upon the memorandum of law in support of the motion to stay arbitration, dated June 23, 2020, the accompanying declaration of Dov B. Gold, plaintiffs Convergen Energy LLC, L'Anse Warden Electric Company, LLC, Euroenergy Biogas Latvia Limited, and Libra Capital US, Inc. (collectively, "Plaintiffs"), by and through their undersigned counsel, move this Court, before Hon. Lewis J. Liman, at the federal courthouse located at 500 Pearl Street, New York, New York, 10007 on a date to be set by the Court for an order staying the arbitration requested by Convergen Energy WI, LLC on June 4, 2020 for the reasons set forth in Plaintiffs' memorandum of law.

Dated: June 23, 2020  
New York, New York

SEIDEN LAW GROUP, LLP

By:      /s/ Dov B. Gold       
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Dov B. Gold  
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*Counsel for Plaintiffs*